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BALABAN & SPIELBERGER, LLP 11999 San Vicente Blvd., Suite 345 Los Angeles, CA 90049 Tel: (424) 832-7677 3 Fax: (424) 832-7702 Daniel K. Balaban, SBN 243652 Andrew J. Spielberger, SBN 120231 Vanessa L. Loftus-Brewer, SBN 265213 6 LAW OFFICES OF TERESA LI, PC 315 Montgomery Street, 9th Floor 8 San Francisco, California 94104 Tel: (415) 423-3377 Fax: (888) 646-5493 10 Teresa Li, SBN 278779 11 Attorneys for Plaintiffs 12 13 UNITED STATES DISTRICT COURT 14 CENTRAL DISTRICT OF CALIFORNIA 15 RUBEN JUAREZ, an individual and 16 ISELA HERNANDEZ, an individual 17 Plaintiffs, 18 v. 19 20

PRECISION VALVE & AUTOMATION.

Defendants.

Inc., a corporation and DOES 1-20

Case No.: 2:17-cv-03342

DECLARATION OF CHRISTOPHER MENDOZA IN SUPPORT OF PLAINTIFFS' OPPOSITION TO **DEFENDANT PRECISION VALVE & AUTOMATION, INC.'S MOTION FOR** SUMMARY JUDGMENT

Date: October 1, 2018

Time: 1:30 p.m. Ctrm: 5D, 5th Floor

Judge: Hon. Otis D. Wright II

DECLARATION OF CHRISTOPHER MENDOZA IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT PRECISION VALVE & AUTOMATION, INC.'S MOTION FOR SUMMARY JUDGMENT

DECLARATION OF CHRISTOPHER MENDOZA

I, Christopher Mendoza, hereby declare as follows:

- 1. I have personal knowledge of the facts stated herein and, if called to do so, could and would competently testify thereto under oath.
- 2. I am a former employee of Space X from May 20, 2010 to May 2014. Space X was using Humiseal in 2010 when I started working at Space X, and PVA Inc. had people come to Space X to perform maintenance on the machine. While working at Space X, my formal job title was "Technician." My job duties at Space X included assembly of batteries as well as working inside the conformal coating room under Francisco's supervision.
- 3. During the time I worked at Space X, I was never trained regarding how to read, interpret, and locate MSDS sheets.
- 4. During the time I worked at Space X, I never saw Ruben Juarez mix any chemicals.
- 5. During the time I worked at Space X, I was never provided with or trained to utilize any Standard Operating Procedures.
- 6. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8th day of September, 2018, at Los Angeles, California.

CHRISTOPHER MENDOZA